

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA**

REDBRICK VENTURES LTD. and
PRIMESHIPPING INTERNATIONAL

Plaintiffs,
vs.

CAC MARITIME LTD. and
STIEGLER SHIPPING COMPANY INC.

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Case No. 2:21-cv-249-WSS

IN ADMIRALTY

AFFIDAVIT OF GARY F. STIEGLER

Gary F. Stiegler certifies as follows under penalties of perjury:

1. I am the President of Stiegler Shipping Company Inc., <https://stiegler.net/>, an Alabama corporation headquartered in Mobile, Alabama.
2. Stiegler Shipping Company Inc. opened and holds its PNC bank account at the PNC Bank branch at 7860 Airport Boulevard, Mobile, Alabama 36608.
3. Stiegler Shipping Company Inc. is a charter broker, shipping agent and licensed international freight forwarder. Stiegler Shipping Company Inc. did not charter the M/V OCEAN FORCE.
4. CAC Maritime Ltd. chartered the M/V OCEAN FORCE from plaintiff Primeshipping International. Atlantic Pacific Chartering was the charter broker and agent for CAC Maritime Ltd., and Stiegler Shipping Company Inc. was acting as brokers only for those shipping cargo aboard the M/V OCEAN FORCE.
5. Stiegler Shipping Company Inc. as international freight forwarder, collected freights from entities carrying cargo aboard the M/V OCEAN FORCE - cargo shippers - owing to CAC Maritime Ltd.

6. From those freights, on behalf of CAC Maritime Ltd., Stiegler Shipping Company Inc. was instructed by Atlantic Pacific Chartering, Panama to wire funds to Primeshipping International to pay charter hire.

7. Stiegler Shipping Company Inc. holds no funds of CAC Maritime Ltd. in its PNC bank account.

8. On February 12, 2021, CAC Maritime Ltd. arrested the M/V OCEAN FORCE at Wilmington, Delaware, where the M/V OCEAN FORCE remains under arrest.

9. The reason for the arrest by CAC Maritime Ltd. is due to the breach of the charter party with CAC Maritime Ltd. by Primeshipping International, as detailed in the Verified Complaint filed in the United States District Court, District of Delaware.

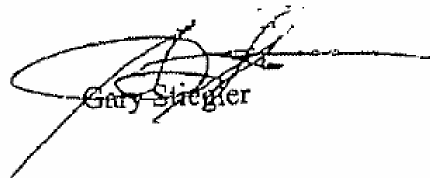
10. Because of the breach of charter party, cargo shippers some time ago stopped paying freights to CAC Maritime Ltd., either to the PNC account of Stiegler Shipping Company Inc. or otherwise.

11. Funds presently in the Stiegler Shipping Company Inc. PNC account do not belong to CAC Maritime Ltd. Any attachment or garnishment of those funds is wrongful.

12. Stiegler Shipping Company Inc. has no contractual or other relationship with plaintiffs and owes no money to plaintiffs.

I declare certify under penalty of perjury that the foregoing is true and correct.

Executed on February 23, 2021.


Gary Stiegler